

Sandown Park Racecourse

PINS Ref:K3605/W/20/3249790
APP/20190551

Rebuttal Transport Evidence by
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JCR5/5 Transport Rebuttal

November 2020

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1 INTRODUCTION

1.1.1 This Transport Rebuttal considers new evidence and arguments introduced by the Council's transport witness Ian Keith Campbell Mitchell (IM) of Mayer Brown in his proof of Evidence and Appendices dated October 2020. In my rebuttal I have referred to the paragraph numbers in IM's evidence

1.1.2 IM was appointed subsequent to members refusing planning permission for the Sandown Park Racecourse development at committee in October 2019 and is supporting the members transport reasons for refusal. Officers at both Elmbridge Borough Council (EBC) and Surrey County Council (SCC) had recommended to members that the development was acceptable.

1.2 Structure of Evidence

1.2.1 My rebuttal evidence will comprise the following:

2.0 The Background

2.1 NPPF Policies

2.2 High Authority Application Response

3.0 The Detailed Highways and Transport Case

3.1 The Sustainability of the Development

3.2 The Sustainability of the Site

3.3 Bus Services

3.4 Rail Services

3.5 Maximum Walking Distances

3.6 Cycling

3.7 Do the Highways Assessments only assess whether severe harm would occur

3.8 The sensitivity of the road network to minor changes in traffic

4.0 Summary and Conclusions

2 THE BACKGROUND

2.1.1 This responds to section 2.0 of IM's evidence.

2.2 NPPF Policies (IM paragraph 2.1 to 2.6)

2.2.1 IM accepts that there are no grounds for highways refusal when set against the criteria in paragraph 109 of NPPF, namely he is not raising concerns that "Severe" harm could occur. (IM Proof paragraph 2.2)

2.2.2 IM is however suggesting that there could be transport impacts which should be considered in the balance of harm to the Green Belt. In support of this IM refers to a Secretary of State's Decision Letter from 2012 relating to an appeal for development at Bishops Stortford School. However there are significant issues with regard to drawing a comparison between this development and the proposed Sandown development. These are as follows.

- The planning applications were prepared and submitted in 2010 before the NPPF was published.
- The public inquiry also took place before the NPPF was published.
- The proposals were for a much larger development, approximately 26,000m² (280,000sqft) of school area with 2,500 pupils, 360 staff, ancillary development and around 700 homes as far as we can determine.
- The development appears to have had much higher levels of traffic generation, approximately 1,500 vehicle movements from the school alone. These 1,500 vehicle trips were concentrated into a short time period.
- School pupils have no choice but to arrive in the peak highway hours.

2.3 High Authority application response (IM Proof paragraph 2.7 to 2.10)

2.3.1 IM asserts that officers at SCC and EBC only considered whether or not the traffic impact of the development was "Severe" in terms of NPPF when they recommended approval at committee. This implies that SCC and EBC were either not aware or did not take into account the impact on the Green Belt and the policies in NPPF. The committee report suggests otherwise in that it contains a

comprehensive review of Green Belt issues and that officers were well aware of these issues.

- 2.3.2 My understanding of the SCC position, from our discussions leading up to the planning committee, is that they wanted to be certain that any potential traffic impacts from the proposed development would be mitigated. This is why SCC requested the agreed package of sustainable transport improvements as confirmed in the conclusions from the Transport Assessment at paragraph 7.1.9

It is apparent from the trip generation and junction capacity assessments, that the proposed development will not have a noticeable impact on the transport network. However, it is recognised that the existing road network is already congested and that the development needs to encourage sustainable modes of transport. Therefore, in addition to the Travel Plans for the residential and hotel uses JCR have agreed to prepare a race and exhibition day Travel Plan as part of this application. A range of measures to improve conditions for pedestrians and cyclists and manage traffic on the road network will also be provided. These measures will also improve the safety of road users and pedestrians. The measures will be agreed with SCC before the application goes to committee and will be secured by planning conditions.

- 2.3.3 The measures referred to are the package of sustainable transport improvements that are now proposed with the development.
- 2.3.4 As set out my Evidence my view is that the impacts would not be noticeable even without the proposed sustainable transport measures. For instance even on the "Worst Case" analysis (which significantly overestimates the residential traffic generation) Portsmouth Road (which will carry the highest number of development trips) would see an increase of less one vehicle every minute or approximately one vehicle every two minutes in each direction in the AM peak hour (see in Table 3.10 and paragraph 3.3.5 of the TSoC). This is before making any allowance for the proposed transport improvements. In practice I would expect the increase in traffic as a result of the development to be substantially lower than the "Worst Case" for a number of reasons as set out in the TSoC.
- 2.3.5 However I recognise that the sustainable transport improvements would support the policies of SCC and EBC and have a positive impact on sustainable transport

and safety in the area which would benefit all residents and help to encourage sustainable transport and reduce car use in the area.

3 THE DETAILED HIGHWAYS AND TRANSPORT CASE

3.1 The sustainability of the development (para 3.4 to 3.11)

3.1.1 Firstly we note that there is a difference of opinion between IM and EBC as demonstrated by the signed planning Statement of Common Ground which recognises that the proposed development is in a “highly sustainable” location.

3.1.2 The sustainability of a suburban location such as this depends on a range of factors including access to schools, shops, public transport, local services and employment opportunities by sustainable transport modes. The development provides access to all of these which is why we, SCC and EBC have referred to the sites as being in “highly sustainable” locations for the proposed development.

3.2 The sustainability of the site (para 3.12 to 3.18)

3.2.1 IM claims that the Transport for London “Public Transport Accessibility Level” methodology (PTAL) can be used to measure relative sustainability. This is not correct, PTAL takes no account of walking and cycling or the proximity to local services. PTAL as its name suggests only considers public transport accessibility. Even then it is not suitable for use in Surrey and in particular areas such as Esher due to the PTAL cliff edge effect. PTAL is considered further in section 6 and Appendix 3 of my evidence.

3.3 Bus services (para 3.19 to 3.29)

3.3.1 IM notes that the bus services on Lower Green Road, More Lane and parts of Portsmouth Road provide a frequency of approximately two buses per hour each way at peak times. These are the same bus services that serve much of the surrounding area. I have looked at a number of suburban locations in Surrey and a frequency 1 or 2 buses per hour is typical. Also there are more frequent bus services from Esher town centre which is within reasonable walking distance of Sites 1, 2 and 5.

3.3.2 In addition the bus stops improvements agreed with SCC should encourage more people to use buses. The improvements include real time information which informs passengers of when the next bus is due to arrive and shelters. Both of these measures would also give the bus services more visibility and a feeling of presence and permanence which should encourage bus use and increase bus

patronage.

3.4 Rail services (para 3.30 to 3.38)

- 3.4.1 IM does not seem to be aware of the pedestrian route that provides direct access to Esher Station from Lower Green Road, (paragraph 3.36). We can confirm that the route already exists and is well used by local residents. It is not a new route proposed by the development as suggested by IM. The location of the route was clarified in my evidence in Appendix 4, at paragraph 4.7 and is shown on figure 8.
- 3.4.2 IM states that there is insufficient capacity on rail services at Esher Station. However the information from the South Western Rail website does not support this assertion. This information shows there is capacity on all trains at all times in the peak hours although for 30 minutes of the day between 0722 and 0752 (pre Covid 19) some passengers at Esher Station may not get a seat. However this is normal for commuting into London at peak times on a 20 to 30 minute journey.
- 3.4.3 As indicated in my evidence at section 4 and section 4 of the Transport Statement of Case there are significant improvements proposed in terms of Esher Station to encourage rail travel and walking to the Station.

3.5 Maximum walking distances (para 3.39 to 3.44)

- 3.5.1 IM notes that the majority of the proposed development is outside of mean walking distances to regular bus services and Esher Railway Station. However this is not correct because it ignores all of the closer bus stops on Portsmouth Road, Lower Green Road and More Lane and the pedestrian route between Lower Green Road and the Station. Also the quoted mean distances do not represent a limit on how far people are prepared to walk and many if not all local residents will walk further than 1,000m to access Esher Station.

3.6 Cycling (para 3.45 to 3.46)

- 3.6.1 The 10 cycle trips quoted by IM are for a typical development based on existing survey results. We would anticipate that as the Councils policies to promote cycling take effect cycling would become a more important mode of travel in Esher and the surrounding area.

3.7 Do the highways assessments only assess whether severe harm would occur (para 3.48 to 3.63)

- 3.7.1 IM claims that the highways assessments which support the application only assess whether severe harm would occur. This is not correct. The highway assessments considered the impact of the development on its merits not just with regard to whether or not they would be "Severe".
- 3.7.2 The predicted traffic increases even on a "Worst Case" basis would be very limited amounting to a maximum of 53 vehicles at any one point on Portsmouth Road two way or approximately one vehicle every two minutes in each direction. This is well within existing traffic variations on the local roads and would not be noticeable.
- 3.7.3 The proposed development would have approximately 800 to 900 residents as a higher estimate. This compares with a local population of approximately 5,000 that we estimate could benefit from the proposed improvements for walking and public transport, this excludes any wider measures for cycling that Elmbridge might choose to fund from the £4.5 million CIL payment for the development

3.8 The sensitivity of the road network to minor changes in traffic (IM proof paragraph 3.54 to 3.61)

- 3.8.1 IM makes the point that as the road network becomes more congested it could become more sensitive to changes in traffic. This matter was discussed with SCC and it was agreed that it was questionable whether detailed analysis of the road network would add any additional knowledge relevant to the assessment of the application. This is because the changes in traffic from the development were so small, one vehicle every two minutes in each direction on Portsmouth Road based on the "Worst Case" analysis. Even then this is before making any allowance for the proposed transport improvements that should encourage sustainable trips. The increases on other roads would be even smaller. Therefore it was agreed that we should concentrate our efforts on a package of measures to encourage both new and existing residents to make more use of sustainable transport and reduce car trips in line with both SCC and EBC transport policies.

4 SUMMARY AND CONCLUSIONS

4.1.1 I have carefully read the Council's transport evidence and considered the matters raised and there is nothing within this that would cause me to change the conclusions in my Evidence. The development would not have any adverse transport impacts. Indeed with the proposed transport improvements it would have a positive impact by encouraging sustainable transport, improving conditions for walking, bus and rail passengers and improving safety.

